

Exhibit E

Experience of Charles E. Schaffer

As representative of his experience, Mr. Schaeffer or his close colleagues at LSB have been appointed members of leadership teams in *In re Target Corporation Customer Data Security Breach Litigation*, MDL 2522 (D. Minn.) (settlement value \$39 million settlement for plaintiff financial institutions), *Green v. Accolade, Inc.*, 2:18-cv-00274 (E.D. Pa.) (employer data breach resulting in compromised employee PII) ; *Kuss v. American Home Patient, Inc. et. al.*, 8:18 -cv-0248 (M.D. Fla.) (stolen laptops compromised patient's medical information); *Abdelmessih v. Five Below, Inc.*, 2:19-cv-01487 (E.D. Pa.) (retailer data breach compromising customers' PII), and *In re Hudson's Bay Company Data Security Incident Consumer Litigation*, Civil Action No. 18-cv-8472 (S.D.N.Y.) (retailer data breach compromised customers' electronically-stored PII).

In addition, *In re Marriot International Customer Data Security Breach Litigation*, MDL No. 2879 (D. Mass.), Mr. Schaffer has served as member of plaintiffs' screening or vetting committee and assisted leadership in vetting plaintiffs for inclusion in the consolidated amended complaint., in *In Re Wawa Data Security Litigation*, Civil Action No. 2:19-cv-06019 (E.D. Pa.), Mr. Schaffer is co-chair of third party discovery committee, in *Smallman v. MGM Resorts International*, , Civil Action No. 2:20-cv-00376 (D.NV.), Mr. Schaffer is on the third party discovery and deposition committee and in *Culbertson et al v. Deloitte Consulting LLP* Civil

Action No. 1:20-cv-0396 (S.D.N.Y.), Mr. Schaffer is on the pleadings and expert committee.

In addition, Mr. Schaffer and his firm also have experience in privacy cases, including serving as Co-lead counsel in *Bryd v. Aaron's Inc.*, No. 11-101 (W.D. Pa.) and *Peterson v. Aaron's Inc.*, No. 1-14-cv-1919 (N.D. Ga.)(where defendant placed spyware on rental computers) and on the Executive Committee in *In re Carrier IQ, Inc., Consumer Privacy Litigation*, No. 12-md-1330 (N.D. Cal.) (where defendant placed software on mobile devices).¹

Mr. Schaffer is also serving as Co-Lead Counsel or as member of executive committee in other consumer class actions such as *In re DevaCurl Hair Products Litigation*, No. 1:20-cv- 01234-GHW (S.D.N.Y.). Along with his class action and mass tort experience, Mr. Schaffer has an LLM in Trial Advocacy and has extensive experience prosecuting complex individual actions on behalf of injured individuals in products liability, medical negligence and drug and medical device actions. He

¹ The Carrier IQ litigation involved Carrier IQ software placed on mobile devices that surreptitiously captured private information, including URIs, search terms, user names, passwords and geo-locations resulting in an invasion of privacy. During the litigation, Mr. Schaffer worked as part of the discovery and expert committees. After securing through discovery motions practice computerized records referred to by counsel for Google Inc. as “radioactive,” Mr. Schaffer was instrumental in demonstrating that the software at issue was intercepting consumers’ private SMS text messages. This led to a national class action settlement which provided monetary benefits to the class as well as changes to the way that the software is coded. The Aaron’s litigation involves spyware surreptitiously placed on rental computers by the rental company resulting in an invasion of the consumer’s privacy.

has served as Lead Counsel in these matters and successfully tried cases to jury verdicts.